

**THIS OBJECTION SEEKS TO DISALLOW CERTAIN FILED PROOFS OF CLAIM. PARTIES RECEIVING THIS NOTICE SHOULD REVIEW THE OBJECTION TO SEE IF THEIR NAME(S) AND/OR CLAIM(S) ARE LOCATED IN THE OMNIBUS OBJECTION AND/OR THE ATTACHED SCHEDULE TO DETERMINE WHETHER THIS OBJECTIONS AFFECTS THEIR CLAIM(S)**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN, Inc., *et al.*,

Post-Effective Date Debtors.<sup>1</sup>

)

) Chapter 11

)

) Case No. 25-10068 (CTG)

)

) (Jointly Administered)

)

) **Hearing Date: December 16, 2025 at 10:00 a.m. (ET)**

) **Obj. Deadline: December 3, 2025 at 4:00 p.m. (ET)**

**NOTICE OF GUC TRUST'S THIRD OMNIBUS (NON-SUBSTANTIVE)  
OBJECTION TO CERTAIN CLAIMS (LATE FILED CLAIMS)**

**PLEASE TAKE NOTICE** that on November 11, 2025, the JOANN Liquidating Trust (the “GUC Trust”), by and through Steven Balasiano, solely in his capacity as the trustee of the GUC Trust (the “GUC Trustee”), filed the *GUC Trust’s Third Omnibus (Non-substantive) Objection to Certain Claims (Late Filed Claims)* (the “Objection”) with the United States Bankruptcy Court for the District of Delaware (the “Court”)

**PLEASE TAKE FURTHER NOTICE** that any responses to the Objection must be in writing, conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware, and be filed with the Court, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801, on or before **December 3, 2025 at 4:00 p.m. (Eastern Time)**.

<sup>1</sup> The Post-Effective Date Debtors in these chapter 11 cases are: JOANN Inc.; Needle Holdings LLC; Jo-Ann Stores, LLC; Creative Tech Solutions LLC; Creativebug, LLC; WeaveUp, Inc.; JAS Aviation, LLC; joann.com, LLC; JOANN Ditto Holdings Inc.; Dittopatterns LLC; JOANN Holdings 1, LLC; JOANN Holdings 2, LLC; and Jo-Ann Stores Support Center, Inc.

**PLEASE TAKE FURTHER NOTICE THAT** that at the same time, you must also serve a copy of such response or objection upon: (a) the Office of the United States Trustee for the District of Delaware, 844 King Street, Suite 2207, Wilmington, Delaware 19801, Attn.: Timothy Jay Fox, Jr. (timothy.fox@usdoj.gov) and (b) counsel for the GUC Trust (i) Kelley Drye & Warren LLP, 3 World Trade Center, 175 Greenwich Street, New York, New York 10007, Attn.: Eric R. Wilson (EWilson@KelleyDrye.com), Maeghan J. McLoughlin (MMcloughlin@kelleydrye.com), and Charles J. Fendrych (CFendrych@kelleydrye.com) and (ii) Benesch, Friedlander, Coplan & Aronoff LLP, 1313 N. Market Street, Suite 1201, Wilmington, Delaware 19801, Attn: Jennifer R. Hoover (jhoover@beneschlaw.com) and Steven L. Walsh (swalsh@beneschlaw.com).

**PLEASE TAKE FURTHER NOTICE** that every response must contain, at a minimum, the following information:

- a. a caption setting forth the name of the Court, the above-referenced case number, and the title of the Objection to which the Response is directed;
- b. the name of the claimant, the claim number, and a description of the basis for the amount of the Claim;
- c. a concise statement setting forth the reasons why the disputed claim should not be disallowed for reasons set forth in the Objection including, but not limited to, the specific factual and legal bases upon which the claimant relies in opposing the Objection;
- d. all documentation or other evidence of the Claim in question, to the extent not already included with the claimant's proof of claim, upon which the claimant will rely in opposing the Objection; and
- e. the name, address, telephone number, and fax number of the person(s) (who may be the claimant or a legal representative thereof) to whom counsel for the GUC Trust should serve a reply to the Response and who possesses authority to reconcile, settle or otherwise resolve the objection to the disputed claim on behalf of the claimant.

**PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE OBJECTION WITHOUT FURTHER NOTICE OR HEARING.**

**PLEASE TAKE FURTHER NOTICE** THAT A HEARING TO CONSIDER THE RELIEF SOUGHT IN THE OBJECTION IS SCHEDULED FOR **DECEMBER 16, 2025, AT 10:00 A.M. (EASTERN TIME)** BEFORE THE HONORABLE CRAIG T. GOLDBLATT, UNITED STATES BANKRUPTCY JUDGE, UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 NORTH MARKET STREET, 3RD FLOOR, COURTROOM NO. 7, WILMINGTON, DE 19801. ONLY THOSE RESPONSES MADE IN WRITING AND TIMELY FILED AND RECEIVED WILL BE CONSIDERED BY THE COURT AT ANY SUCH HEARING.

**PLEASE TAKE FURTHER NOTICE** that copies of each pleading can be viewed and/or obtained by: (i) accessing the Court's website at [www.deb.uscourts.gov](http://www.deb.uscourts.gov), or (ii) from the Debtor's noticing and claims agent, at <https://cases.ra.kroll.com/JOANN2025/Home-DocketInfo> or by calling (844) 712-2239 (U.S./Canada) or (646) 863-7121 (International). A PACER password is needed to access documents on the Court's website.

*[Remainder of page intentionally left blank]*

Dated: November 11, 2025

**BENESCH, FRIEDLANDER,  
COPLAN & ARONOFF LLP**

/s/ Steven L. Walsh

Jennifer R. Hoover, Esq. (No. 5111)  
Steven L. Walsh, Esq. (No. 6499)  
1313 N. Market Street, Suite 1201  
Wilmington, DE 19801  
Telephone: (302) 442-7010  
Facsimile: (302) 442-7012  
Email: jhoover@beneschlaw.com  
swalsh@beneschlaw.com

*Co-Counsel to the GUC Trust*

**KELLEY DRYE & WARREN LLP**

Eric R. Wilson (admitted *pro hac vice*)  
Maeghan J. McLoughlin (admitted *pro hac vice*)  
Charles J. Fendrych (admitted *pro hac vice*)  
3 World Trade Center  
175 Greenwich Street  
New York, New York 10007  
Tel: (212) 808-7800  
Fax: (212) 808-7897  
Email: EWilson@KelleyDrye.com  
MMcloughlin@kelleydrye.com  
CFendrych@kelleydrye.com

*Co-Counsel to the GUC Trust*

**PACHULSKI STANG ZIEHL & JONES  
LLP**

By: /s/ James E. O'Neill

Bradford J. Sandler (DE Bar No. 4142)  
James E. O'Neill (DE Bar No. 4042)  
919 North Market Street, 17<sup>th</sup> Floor  
P.O. Box 8705  
Wilmington, DE 19801  
Telephone: (302) 652-4100  
Facsimile: (302) 652-4400  
Email: bsandler@pszjlaw.com  
joneill@pszjlaw.com

*\*Co-Counsel to the GUC Trust with respect  
to the Objection to the Claims of PG&E and  
Hewlett Packard Financial Services Company*